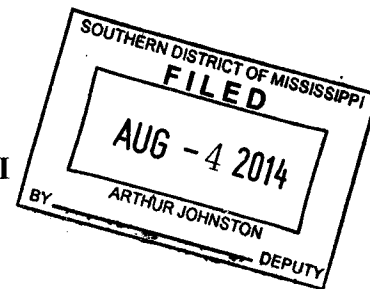


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
~~JACKSON DIVISION~~
Northern



WEBBIE JACKSON as Next of Kin
On behalf of RYAN FEDELL MADDOX, DECEASED

PLAINTIFF

v.
OFFICER, JOHN DOE
OFFICER, MARQUETTE DORSEY
POLICE CHIEF KEITH WALTER ARMSTRONG
CITY OF VICKSBURG

CIVIL ACTION No:

3:14cv599 CWA-LRA

DEFENDANT

COMPLAINT

JURY TRIAL DEMANDED

COMES NOW, the Plaintiffs and file this Complaint against the Defendants and allege the following:

PLAINTIFFS

1. Plaintiff Webbie Jackson is an adult resident of Seattle, Washington and brings this action on behalf of his child the deceased and all wrongful death beneficiaries of Ryan Fedell Maddox.
2. This is an action for damages that exceeds \$50,000.00.
3. The plaintiff is the duly appointed administrator of the estate of Ryan Fedell Maddox in Civil Action No. 2014-049 PR in the Chancery Court of Warren County, Mississippi.
4. The Potential beneficiaries of the recovery in this wrongful death action and the relationship of each to the decedent are:

Webbie Jackson} Father

Children} Devin Flowers Braintae Maddox, and Kimberly Mobly

DEFENDANT

5. Defendant, Officer John Doe, is a Mississippi resident and an agent of the Vicksburg Police Department and may be served with process at 721 Clay St., Vicksburg, MS 39183.
6. Defendant, Officer Marquette Dorsey, is a Mississippi resident and an agent of the Vicksburg Police Department and may be served with process at 721 Clay St, Vicksburg, MS 39183.
7. The Vicksburg Police Department/ Chief Keith Walter Armstrong is a Mississippi resident and may be served with process at 721 Clay St, Vicksburg, MS 39183.
8. The Defendant City Mayor Office is Mississippi resident and may be served with process at 1401 Walnut St, Vicksburg, MS 39180.

JURISDICTION AND VENUE

9. The Southern District of the State of Mississippi has jurisdiction over defendants, Officer John Doe, the Vicksburg Police Department, Officer Marquette Dorsey, the Vicksburg Police Department/ Police Chief Keith Walter Armstrong, and the City of Vicksburg Mayor Office to the act occurring in Vicksburg, and in Warren County Mississippi.
10. The injuries described in this complaint occurred in the Jackson Division of Southern District of Mississippi.

FACTUAL BACKGROUND

11. On April 9th, 2012 Plaintiff's Son Ryan Fedell Maddox (hereinafter Maddox or deceased) was arrested and booked in at the Vicksburg City Jail by Officer Marquette

Dorsey and Officer John Doe for charges of receiving stolen property or theft, it was during his initial arrest when deceased began to ask questions and forms of excessive force was used that resulted in plaintiff's son's death; that counsel states through information and belief that excessive force was used to retain the deceased that resulted in Maddox death.

LIABILITY OF OFFICER JOHN DOE/MARQUETTE DORSEY

12. As a proximate result of Defendant's intent or negligence, Decedent suffered bodily injury and physical and mental pain and suffering that caused his death. Decedent sustained loss of income and incurred liability for the expenses of medical care before his death as well as loss of enjoyment of life.

DAMAGES

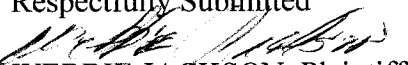
13. Further, the above-named surviving relatives of decedent lost the support and services of the decedent, and the decedent's estate sustained liability for his final medical services and funeral expenses and for those expenses paid by some of them upon decedent's funeral expenses. Also, they have sustained loss of companionship of the decedent and sustained mental pain and suffering as a result of the Decedent's death.
14. Further, decedent had a working life expectancy of 65 years, and his loss of future income due to his death, at \$25,000.00 per year is \$850,000.00.
15. The wrongful death beneficiaries of Ryan Fedell Maddox are entitled to a verdict against defendants Police Chief Keith Walter Armstrong, Officer Marquette Dorsey,

Officer John Doe and The City of Vicksburg herein for all damages allowable under Mississippi law for the wrongful death of Ryan Fedell Maddox.


CONCLUSION

WHEREFORE, PREMISES CONSIDERED, plaintiffs pray for general relief, and demand a jury trial in the Southern District of Mississippi, Jackson Division and seek an award of \$1,000,000 dollars for all damages, fees, and costs of whatever kind and type available under Federal law against the defendant as a result of the conduct described herein.

Respectfully Submitted


WEBBIE JACKSON, Plaintiff

By:


Chokwe Antar Lumumba, MSB# 102847

CERTIFICATE OF SERVICE

This is to certify that on the below date a true and correct copy of the foregoing was mailed first class, postage prepaid and/or transmitted via telecopier to the following individuals:

Deputy Officer

John Doe

721 Clay St.

Vicksburg, Mississippi 39183

Deputy Officer

Marquette Dorsey

721 Clay St.

Vicksburg, Mississippi 39183

Chief of Police Keith Walter Armstrong

721 Clay St.

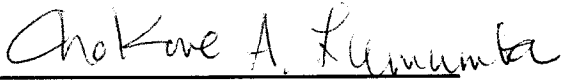
Vicksburg, Mississippi 39183

City of Vicksburg Mayor Office

1401 Walnut St,

Vicksburg, MS 39180

This the 1 day of July 2014.


Chokwe Antar Lumumba, ESQ.